

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

FNU LNU,
a/k/a "Reginald Davis," a/k/a/ "Jay," and
TYRONE OLDYN,
a/k/a "TJ,"

Defendants.

SEALED INDICTMENT

23 Cr.

23 CRIM 678

COUNT ONE
(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. In or about October 2023, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Reginald Davis," a/k/a "Jay," and TYRONE OLDYN, a/k/a "TJ," the defendants, and others known and unknown, willfully and knowingly combined, confederated, and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that FNU LNU, a/k/a "Reginald Davis," a/k/a "Jay," and TYRONE OLDYN, a/k/a "TJ," the defendants, and others known and unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, FNU LNU and OLDYN agreed to make and cause to be made false statements to,

among other financial institutions, a federally insured credit union in Massachusetts (the "Credit Union"), in order to obtain funds from the Credit Union.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Interstate Transportation of Fraudulently Obtained Property)

The Grand Jury further charges:

3. On or about October 16, 2023, FNU LNU, a/k/a "Reginald Davis," a/k/a "Jay," and TYRONE OLDYN, a/k/a "TJ," the defendants, knowingly transported, transmitted, and transferred in interstate and foreign commerce goods, wares, merchandise, securities, and money of the value of \$5,000 and more, knowing the same to have been stolen, converted, and taken by fraud, and did aid and abet the same, to wit, FNU LNU and OLDYN participated in a scheme to fraudulently obtain approximately \$19,000 in cash from a financial account at the Credit Union belonging to another individual without that individual's knowledge or consent, and knowingly caused the fraudulently obtained funds to be transported from Massachusetts through the Southern District of New York to Brooklyn, New York.

(Title 18, United States Code, Sections 2314 and 2.)

FORFEITURE ALLEGATIONS

4. As a result of committing the offense alleged in Count One of this Indictment, FNU LNU, a/k/a "Reginald Davis," a/k/a "Jay," and TYRONE OLDYN, a/k/a "TJ," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 28 United States Code, Section 2461(c), any and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

5. As a result of committing the offense alleged in Count Two of this Indictment, FNU LNU, a/k/a "Reginald Davis," a/k/a "Jay," and TYRONE OLDYN, a/k/a "TJ," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

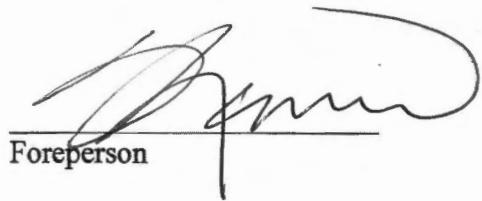
Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


Foreperson

Damian Williams
DAMIAN WILLIAMS
United States Attorney